



Wood Environment & Infrastructure Solutions, Inc.
600 University Street, Suite 600
Seattle, Washington 98101
USA
T: 206-342-1760
www.woodplc.com

Prepared for: Janette Knittel/EPA Region 10/15-H04
Date: **December 10, 2019**
Copies to: Lee Thomas/EPA Region 10/14-D12
Jennifer MacDonald/EPA Region 10/11-C07
Project File





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Prepared for: Janette Knittel/EPA Region 10/15-H04
Date: December 10, 2019
Subject: Monthly progress report – November 2019
Site name and location: Former Rhone-Poulenc, Inc., Facility
East Marginal Way, Tukwila, Washington
Reporting period: November 1 through November 30, 2019

Wood Environment & Infrastructure Solutions, Inc., (Wood) prepared this progress report on behalf of the Respondents. This report summarizes pertinent, implemented, and planned Resource Conservation and Recovery Act corrective action activities at the former Rhone-Poulenc, Inc., facility located on East Marginal Way in Tukwila, Washington. This document is being transmitted to fulfill the monthly progress report requirement in U.S. Environmental Protection Agency (EPA) Region 10 Administrative Order on Consent No. 1091-11-20-3008(h) (the Order). The western portion of the site is referred to as the Insurance Auto Auctions, Inc. (IAAI), Lease Parcel.

Activities completed or in progress for this reporting period

Progress report

The October 2019 monthly progress report required under the Order was delivered to EPA on November 12, 2019, via courier.

King County self-monitoring sampling and reporting

The most recent self-monitoring sampling event was completed on December 4, 2019. The self-monitoring report is due to King County on January 15, 2020.

Interim and corrective measures

This section summarizes key activities performed related to implementation of the hydraulic control interim measure (HCIM).

Performance monitoring

The Round 85 Performance Monitoring report was finalized and send to EPA on November 25, 2019.

Hydraulic control

The pre-treatment system operated under automatic control from November 1 to November 30, 2019. Water level data was downloaded from both the data recorder and the programmable logic controller (PLC) on November 1, 2019. There was a 3.5-hour long data gap in the water levels recorded by both the PLC and the data recorder. It is thought that this gap may have been caused by a short power outage. We will double check the data recorder the next time we are on-site.

The differential between average water levels in wells DM-8 and MW-49 was maintained at more than 1 foot from November 1 to November 30 and was approximately 2.20 feet at the end of November 2019. We will



continue to report flow using the totalized flow from the individual extraction wells due to a slight undercount of flow by the totalizing flow meter.

There is an ongoing slow leakage from the EX-3 piping that interferes with automatic operation of EX-3 with the well shutting down due to lack of flow when EX-3 is activated. Any leakage from the EX-3 conveyance piping will be contained within the barrier wall.

Corrective measures study

The Agency Draft Corrective Measures Study (CMS) Work Plan was delivered to EPA on September 2, 2014. As of the end of June 2019, the Respondents are still awaiting EPA's comments on the Agency Draft CMS Work Plan. See the sections below for details concerning the CO₂ Neutralization Pilot Study (CO₂ Pilot Study).

CO₂ pilot study

The AQTESOLV software was installed on September 30, 2019. We will use this software to analyze the pre- and post-injection slug test data. We are currently planning on compiling the results of the CO₂ Pilot Study starting in February 2020.

Activities planned for next reporting period

Various activities associated with the IAAI Lease Parcel will continue during the next reporting period. During December 2019, the Respondents plan to:

- Continue regularly-scheduled operations and maintenance activities associated with the HCIM;
- Collect the King County self-monitoring sample and download the water levels from the transducers;
- Await EPA's forthcoming comments on the CMS Work Plan, if any.

On behalf of the Respondents, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this report, Monthly Progress Report – November 2019, is true, accurate, and complete. As to those portions of the report for which I cannot personally verify accuracy, I certify under penalty of law that this report and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who may manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By: _____



Date: December 10, 2019

JL/WMY:al

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Knittel, Janette

From: Long, John <john.long3@woodplc.com>
Sent: Tuesday, December 10, 2019 4:31 PM
To: Knittel, Janette
Cc: Thomas, Lee; Arron King; Young, William; Lukasheva, Angelica; Merrell, Melissa
Subject: November 2019 Container Properties/Former Rhone-Poulenc Monthly Progress Report
Attachments: Monthly Progress Report November 2019_Sx.pdf

Janette:

Attached is the PDF of the November 2019 Monthly Progress Report for the Container Properties/Former Rhone-Poulenc site. Hard copies are being delivered to EPA early tomorrow morning.

Please let me know if you have any questions.

- John

John D. Long, LG., L.Hg.
Senior Associate Hydrogeologist
600 University Street, Ste 600
Seattle, Washington, 98101
D +1 (206) 342-1779
F +1 (206) 342-1761
M +1 (206) 713-9499
E john.long3@woodplc.com



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